

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

JOHN D. CERQUEIRA,

Plaintiff,

v.

AMERICAN AIRLINES, INC.,

Defendant.

Civil Action No: 05-11652-WGY

**JOINT MOTION TO ENLARGE TIME FOR PLAINTIFF TO
RESPOND TO DEFENDANT'S MOTION FOR SUMMARY
JUDGMENT TO PERMIT THE PARTIES TO ENTER INTO MEDIATION**

Pursuant to Fed. R. Civ. P. 6(b), Plaintiff John D. Cerqueira, by his attorneys, Birnbaum & Godkin, LLP and Public Citizen Litigation Group, and Defendant American Airlines, Inc., by its attorneys, Fitzhugh, Parker & Alvaro LLP, hereby jointly move to enlarge the time for Plaintiff to respond to Defendant's Motion for Summary Judgment. As grounds for this motion, the parties state that they are scheduled to participate in a mediation session presently scheduled before the Honorable Magistrate Judge Dein on September 27, 2006. The parties move to enlarge the time for Plaintiff to respond to Defendant's Motion for Summary Judgment until twenty-one days after the completion of mediation to give the parties an opportunity to prepare for and participate in the mediation session, and to avoid the necessity of responding to the Motion in the event that the case is resolved at the mediation.

WHEREFORE, John D. Cerqueira and American Airlines, Inc. respectfully request that the Court allow this motion; and grant such other relief as the Court deems just and proper.

Respectfully submitted,

JOHN D. CERQUEIRA,
By his attorneys,

AMERICAN AIRLINES, INC.,
By its attorneys,

/s/ David S. Godkin

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Dated: August 24, 2006

CERTIFICATE OF SERVICE

I, David S. Godkin, hereby certify that a true and correct copy of the foregoing document was delivered to all counsel of record on August 24, 2006 by electronic means.

/s/ David S. Godkin